

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

TIARE TECHNOLOGY, INC.,

Plaintiff,

v.

BED BATH & BEYOND, INC.,

Defendant.

**No. 2:21-cv-00301-JRG-RSP**

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO  
MOVE, ANSWER OR OTHERWISE RESPOND TO PLAINTIFF'S COMPLAINT**

Bed Bath & Beyond Inc. ("Defendant" or "Bed Bath & Beyond"), without waiving any defenses, respectfully moves the Court to extend the time within which Defendant is required to move, answer, or otherwise respond to Plaintiff's Complaint by four (4) days from October 14, 2021 to October 18, 2021. This motion is unopposed by Plaintiff Tiare Technology, Inc. ("Plaintiff" or "Tiare"). In support of their Motion, Defendant states as follows:

1. On August 5, 2021, Plaintiff filed its Complaint alleging patent infringement against Defendant.
2. Defendant previously requested and was granted a total of forty-five (45) days extension to respond to the original Complaint, pursuant to Local Rule CV-12. (Dkt. Nos. 7, 8).
3. Plaintiff has consented to this motion request for an additional four (4) days to respond to the Complaint.
4. Defendant requests this additional extension of time in good faith, in light of the upcoming deadline to respond to the Complaint, and not for purposes of delay.

5. Defendant's agreement with Plaintiff should not be construed as a waiver of any other rights or defenses, including for example, Defendant's right to file counterclaims, affirmative defenses, or to otherwise challenge the validity of the patents.

WHEREFORE, Defendant Bed Bath & Beyond Inc. respectfully requests that the time in which it is required to move, answer, or otherwise respond to Plaintiff's Complaint for patent infringement be extended up to and including October 18, 2021.

Dated: October 13, 2021

/s/ Robert L. Lee

Robert L. Lee

(Georgia Bar No. 443,978)

**ALSTON & BIRD LLP**

One Atlantic Center

1201 West Peachtree St. NE

Atlanta, Georgia 30309-3424

Telephone: (404) 881-7000

Facsimile: (404) 881-7777

Email: Bob.Lee@alston.com

*Attorneys for Defendant*

*Bed Bath and Beyond Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the above and foregoing document has been served on all counsel of record via the Court's ECF system on October 13, 2021.

/s/ Robert L. Lee

Robert L. Lee (Georgia Bar No. 443,978)

**CERTIFICATE OF CONFERENCE**

The undersigned hereby certifies that pursuant to Local Rules CV-7(h) and (i), counsel for Defendant Bed Bath and Beyond Inc. conferred with counsel for Plaintiff Tiare Technology, Inc. regarding the foregoing motion and counsel indicated that they agree to the relief sought herein.

/s/ Robert L. Lee

Robert L. Lee (Georgia Bar No. 443,978)